



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

86 Chambers Street
New York, New York 10007

May 21, 2024

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 05/21/2024

Re: *Reclaim the Records, et ano., v. U.S. Department of State*, No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 522. I write respectfully to request a thirty-day extension of the May 24, 2024 deadline for the Government to file its reply papers in further support of its motion for summary judgment and in opposition to Plaintiffs’ cross-motion, to June 26, 2024, and a corresponding extension of the deadline for Plaintiffs’ reply, if any, to July 3, 2024.

This is the first request by the Government for an extension for its reply/opposition papers, but the Court previously granted the parties several extensions of the briefing schedule. The Government needs more time to arrange for a declaration from an agency contractor to respond to the technical points raised by Plaintiffs’ papers. In addition, the Government intends to submit a supplemental declaration from Ms. Regina Ballard to address the parties’ declarations/arguments, but she will be away the end of this month. Plaintiffs consent to the requested extension.

We thank the Court for its consideration of this letter.

Application GRANTED. The Government's combined reply and opposition is due **June 26, 2024**, and Plaintiffs' reply is due **July 3, 2024**. The Court is highly unlikely to grant any further extension requests absent extraordinarily good cause.

SO ORDERED.

05/21/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendant

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cc: Plaintiffs’ counsel (by ECF)